

N4010

Hearing Date: January 19, 2001  
Time: 2: 00 p.m.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

RANDALL'S ISLAND FAMILY  
GOLF CENTERS, Inc., et al.

Chapter 11  
Case Nos. 00-41065 (smb)  
through 00-41188 (smb)  
(Jointly Administered)

Debtors.  
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**OBJECTION OF TRADE PLAZA I ASSOCIATES TO DEBTOR'S MOTION FOR AN  
ORDER PURSUANT TO SECTIONS 105, 363, 365 and 1146 of the BANKRUPTCY  
CODE AND BANKRUPTCY RULES 2002, 6004, 6006 AND 6007 (1) (A)  
AUTHORIZING AND APPROVING (i) SALE OF CERTAIN FEE-OWNED  
PROPERTIES, (ii) ASSUMPTION, SALE AND ASSIGNMENT OF CERTAIN  
LEASEHOLD INTERESTS, AND (iii) SALE OF PERSONAL PROPERTY, FREE AND  
CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS AND EXEMPT  
FROM ANY STAMP, TRANSFER, RECORDING OR SIMILAR TAX, (B)  
APPROVING CERTAIN SALE PROCEDURES TO BE USED IN CONNECTION  
WITH SUCH SALES, (C) APPROVING THE FORM OF SALE AND ASSIGNMENT  
AGREEMENTS, (D) APPROVING AND AUTHORIZING THE REJECTION AND  
ABANDONMENT OF CERTAIN SERVICE CONTRACTS AND EQUIPMENT  
LEASES OF THE DEBTORS (II) IN THE EVENT THAT PROPERTIES REMAIN  
UNSOLD AT THE CONCLUSION OF THE SALE HEARING, AUTHORIZING AND  
APPROVING THE ABANDONMENT OF UNSOLD FEE-OWNED PROPERTIES  
AND THE REJECTION AND ABANDONMENT OF UNSOLD LEASEHOLD  
INTERESTS, AND (III) SCHEDULING AN EXPEDITED HEARING TO CONSIDER  
SHORTENING THE TIME FOR, FIXING THE DATE, TIME AND PLACE FOR,  
AND APPROVING THE FORM AND MANNER OF NOTICE OF THE HEARING  
ON SUCH SALES**

**TO: THE HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE**

The objection of **TRADE PLAZA I ASSOCIATES (“TRADE PLAZA”)** to the motion of debtor scheduled for hearing on January 19, 2001 by Emergency Order Shortening Time dated January 12, 2001 is as follows:

1. The Debtors filed respective petitions for relief under the Bankruptcy Code on May 4, 2000.

2. TRADE PLAZA is a landlord of debtor LAKE GROVE FAMILY GOLF CENTERS, INC. (“Debtor”) for the site known as Pardoc Vending located at 13 Trade Zone Drive, Ronkonkoma, New York 11779, referred to as “Site No. NY24”.

3. Debtor’s lease with TRADE PLAZA is the subject of the Debtor’s motion dated January 11, 2001, scheduled for hearing on January 19, 2001 by Emergency Order Shortening Time dated January 12, 2001.

4. Although the lease is listed as “Other Assets” in Exhibit “A” to the Debtor’s Motion, it is in fact a lease for non-residential real property.

5. The Bankruptcy Code provides certain protections to landlords in the event their leases are assumed, assumed and assigned, or rejected.

6. TRADE PLAZA does not object to the auction, sale, and/or rejection proposed by the Debtor provided that the proposed order is modified to require that Debtors and/or successful bidders comply with Section 365 of the Bankruptcy Code, and to not eliminate any of the protections afforded to landlords by that Section, by the Bankruptcy Code, or by the Bankruptcy Rules.

**WHEREFORE**, TRADE PLAZA respectfully does not object to the Debtors' motion being granted, provided that the proposed order is modified so that the protections set forth in the Section 365 of the Bankruptcy Code, the Bankruptcy Code, and the Bankruptcy Rules be afforded to it as a landlord; and requests such other and further relief as the Court may deem just and proper.

Dated: Great Neck, New York  
January 17, 2001

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